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10 **NEW U LIFE CORPORATION**

11 **UNITED STATES DISTRICT COURT**
12 **DISTRICT OF NEVADA**
13

14 T1 PAYMENTS LLC, a Nevada limited
15 liability company,

16 Plaintiff,

17 vs.

18 NEW U LIFE CORPORATION, a
19 California corporation,

20 Defendant.

21 AND RELATED COUNTERCLAIM
22
23

Case No. 2:19-cv-01816-ART-DJA

**MOTION OF ROME LLP TO
WITHDRAW AS COUNSEL *PRO HAC*
VICE; DECLARATION OF BRIANNA
DAHLBERG; ~~PROPOSED~~ ORDER**

24 Pursuant to Local Rule IA 11-6 and Rule 1.16 of the Nevada Rules of Professional Conduct,
25 undersigned counsel moves the Court for an order authorizing Rome LLP, and its individual
26 attorneys Eugene Rome and Brianna Dahlberg (collectively, “Rome LLP”), to withdraw as counsel
27 *pro hac vice* for Defendant and Counterclaimant New U Life Corporation (“New U Life”).
28

1 This Motion is made and based upon the following points and authorities and the pleadings
2 and papers on file herein.

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4 DATED: March 12, 2024

ROME LLP

5 By: /s/ Brianna Dahlberg

6 Brianna Dahlberg, Esq.
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MEMORANDUM OF POINTS AND AUTHORITIES

I. INTRODUCTION

Local Rule IA 11-6(b) provides, “If any attorney seeks to withdraw after appearing in a case, the attorney must file a motion or stipulation and serve it on the affected client and opposing counsel.” Furthermore, LR 11-6(e) provides that “no withdrawal or substitution will be approved if it will result in delay of discovery, the trial, or any hearing in the case.” Similarly, Nevada Rule of Professional Conduct 1.16(b) provides that a lawyer may withdraw from representing a client if “[w]ithdrawal can be accomplished without material adverse effect on the interests of the client.”

On September 11, 2020, Eugene Rome and Brianna Dahlberg of Rome LLP (f/k/a Rome & Associates, A.P.C.) each filed a Verified Petition For Permission To Practice In This Case Only By Attorney Not Admitted To The Bar Of This Court And Designation Of Local Counsel (the “Pro Hac Vice Motions”). See Dkt. #31 and #32. The Pro Hac Vice Motions were subsequently granted on September 14, 2020. See Dkt. #33 and #34.

Rome LLP now moves for an order allowing the firm and its individual attorneys to withdraw as counsel *pro hac vice* in this matter. Rome LLP makes this motion with the consent of its client, New U Life. Declaration of Brianna Dahlberg, ¶ 4. New U Life’s local counsel, Puoy K. Premsrirut, will remain as lead counsel to New U Life, ensuring continuity in New U Life’s legal representation. As such, Rome LLP’s withdrawal from this matter will have no effect on the schedule of this matter, including discovery, hearings, or trial, nor will it have any adverse effect on New U Life’s litigation of this case.

CONCLUSION

For the foregoing reasons, Rome LLP respectfully requests that the Court allow Rome LLP and its individual attorneys Eugene Rome and Brianna Dahlberg to withdraw as counsel *pro hac vice* for New U Life.

DATED: March 12, 2024

ROME LLP

By: /s/ Brianna Dahlberg

Brianna Dahlberg, Esq.

DECLARATION OF BRIANNA DAHLBERG

I, Brianna Dahlberg, declare and state as follows:

1. I am an attorney licensed to practice in the state and federal courts of California and a Partner with Rome LLP. I make this declaration on personal knowledge and, if sworn as a witness, could competently testify to each of the facts set forth herein.

2. Rome LLP is counsel *pro hac vice* for Defendant and Counterclaimant New U Life Corporation (“New U Life”) in the above-captioned case.

3. With New U Life’s consent, Rome LLP seeks to withdraw as counsel so that New U Life will be solely represented in this matter by its local Nevada counsel, Puoy Premsrut of Brown Brown & Premsrut.

4. Rome LLP makes this motion to withdraw with the consent of its client.

This declaration was executed on March 12, 2024 at Los Angeles, California. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

By: /s/ Brianna Dahlberg


Brianna Dahlberg, Esq.

ORDER

IT IS ORDERED THAT Rome LLP and its individual attorneys Eugene Rome and Brianna Dahlberg are granted leave to withdraw from representing New U Life in this matter. The names of the firm and its individual attorneys shall be removed from the CM/ECF Service list.

IT IS SO ORDERED.

Dated: 3/13/2024



DANIEL J. ALBREGTS
UNITED STATES MAGISTRATE JUDGE